

EXHIBIT 1

From: [Bret Stanley](#)
To: [Angela Angotti](#)
Subject: RE: Smith - Motion to Extend Docket Control Order
Date: Tuesday, November 18, 2025 5:55:18 PM

Angela,

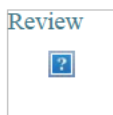
Thanks for emailing.

Do you have permission from your client for me to share the bates label with this document that is from MDL 3084? If no, Clayton Callen, Colton Parks, Kirk Carter, Luke Spencer, Paul Alcaron, or Samuel Schleier could search MDL Database using Aldana's UUID and it will populate. (Assuming Bowman & Brooke has access to the document production.) These guys are listed as Uber's Counsel in the MDL.

I have not shared or used this document with anyone in this matter, but Judge Gonzales has ordered Uber to produce documents that indicate [REDACTED] in connection with RFP 70.

I don't know that you *knowingly* made the false statement and don't believe this is something you would do based on getting to know you. But a false statement to the court was made.

Given with how Uber has directly attacked me in multiple jurisdictions, I need to know that I have permission to share the bates label with you. I don't want to get in a position that Uber comes after me again for this. However, I'm in a position where I will need to move forward soon if we can't work it out.



Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098
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From: Angela Angotti <Angela.Angotti@bowmanandbrooke.com>

Sent: Tuesday, November 18, 2025 4:13 PM

To: Bret Stanley <BStanley@johnsonlawgroup.com>

Subject: RE: Smith - Motion to Extend Docket Control Order

[EXTERNAL]

Bret,

1. Please provide the basis for your claim in the email below that "On the record you made a substantial misrepresentation that Uber has no [REDACTED] for Aldana" I take any allegations that I have misrepresented anything to the Court very seriously, and after spending several days attempting to determine what information I have that could have possibly led you to make that allegation in good faith, I was unable to find anything. You are accusing me of knowingly making a false statement of fact to the Court, and that is a very serious allegation. Please let me know your basis for that claim, immediately, in writing.
2. Please identify the Aldana UUID documents mentioned in your November 13 email below by bates number that you allege demonstrate that the statements I made are "absolutely untrue based on documents related to Aldana's UUID" as I am unable to locate any documents supporting your very serious accusations, that you put in writing to all parties in this case, that I knowingly made a false statement to the Court.

Thank you,

Angela L. Angotti

Partner

+1 512-874-3836 | Angela.Angotti@bowmanandbrooke.com

From: Bret Stanley <BStanley@johnsonlawgroup.com>

Sent: Thursday, November 13, 2025 8:53 AM

To: Angela Angotti <Angela.Angotti@bowmanandbrooke.com>; Jamie Giron <Jamie.Giron@bowmanandbrooke.com>; Estefy Mitre <estefy.mitre@bowmanandbrooke.com>; Sierra Flores <sflores@hannaplaut.com>; Eric Ramos <eric@ericramoslaw.com>; Jorge Herrera <jherrera@herreralaw.com>; Randy Jeffries <rjeffries@ericramoslaw.com>; Sandra Robouin <srobouin@ronramos.com>; Amanda Salvador <amanda@ericramoslaw.com>; Clerk <clerk@ronramos.com>; Ida Montalvo <ida@ronramos.com>; Ronald Ramos <ronramospc@yahoo.com>; Irene Silva <irene@ronramos.com>; Chelsea Ramos <chelsea@ericramoslaw.com>; John Garcia <jgarcia@hannaplaut.com>

Cc: Erica Suarez <erica@ljglaw.com>; Abigail Carrier <acarrier@dorsettjohnson.com>; Larry J. Goldman <larry@ljglaw.com>; David Plaut <dplaut@hannaplaut.com>; Lisa Chapa <lisac@ljglaw.com>; Erika Coignet <erika@ljglaw.com>; Natalie Scott <nscott@hannaplaut.com>; Christina Vansickle <christina@ljglaw.com>; Jack Shea <Jack.Shea@bowmanandbrooke.com>; Sara Margo <Sara.Margo@bowmanandbrooke.com>; Marissa Mooney <Marissa.Mooney@bowmanandbrooke.com>; Camille Cordova <Camille.Cordova@bowmanandbrooke.com>; Lydia Tsao <Lydia.Tsao@bowmanandbrooke.com>; Justina Knight <justina.knight@bowmanandbrooke.com>

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Angela –

Uber has not identified *any* individuals with relevant knowledge of the claims made by the Plaintiff, has not produced a single internal policy, and has sat on discovery for months without response or production. The Court was exasperated in the last hearing and clearly was sending tones that she does not believe we have a chance to try this case without an extension to discovery.

I have not received the records that Uber was Ordered to produce in connection with the 11/5/25 Hearing, attached are the Judge's Notes ordering production on RFPS 12, 23, 24, 32, 51, 65, 67, 70.

Importantly, RFP 70 was granted and Uber is to produce [REDACTED] related to Aldana. On the record you made a substantial misrepresentation that Uber has **no** [REDACTED] **for Aldana**. This is absolutely untrue based on documents related to Aldana's UUID. The Order granting RFP 70 allows me to trigger procedures in the MDL Protective Order to seek this production.

Sincerely,

Bret Stanley

Review



Bret Stanley | Senior Counsel

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From: Angela Angotti <Angela.Angotti@bowmanandbrooke.com>

Sent: Wednesday, November 12, 2025 5:24 PM

To: Bret Stanley <BStanley@johnsonlawgroup.com>; Jamie Giron <Jamie.Giron@bowmanandbrooke.com>; Estefy Mitre <estefy.mitre@bowmanandbrooke.com>; Sierra Flores <sflores@hannaplaut.com>; Eric Ramos <eric@ericramoslaw.com>; Jorge Herrera <jherrera@herreralaw.com>; Randy Jeffries <rjeffries@ericramoslaw.com>; Sandra Robouin <srobouin@ronramos.com>; Amanda Salvador <amanda@ericramoslaw.com>; Clerk <clerk@ronramos.com>; Ida Montalvo <ida@ronramos.com>; Ronald Ramos <ronramospc@yahoo.com>; Irene Silva <irene@ronramos.com>; Chelsea Ramos <chelsea@ericramoslaw.com>; John Garcia <jgarcia@hannaplaut.com>

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[EXTERNAL]

Bret,

Could you please let us know what additional discovery Plaintiff needs that requires a modification of the DCO? We would likely be opposed to a blanket extension for any potential requested discovery, but if there is some specific and discrete discovery that Plaintiff and Defendants were unable to complete for good cause prior to the discovery deadline, I think we can likely come to an agreement on specific discovery items to be completed post discovery deadline.

Speaking of which, despite repeatedly asking for several weeks now, Defendants have not received a response from Plaintiff re the IME and raw data. We filed a motion on this issue, do we need to set it for hearing or can you provide the information by end of day tomorrow?

Angela L. Angotti

Partner

+1 512-874-3836 | Angela.Angotti@bowmanandbrooke.com

From: Bret Stanley <BStanley@johnsonlawgroup.com>

Sent: Wednesday, November 12, 2025 4:31 PM

To: Jamie Giron <Jamie.Giron@bowmanandbrooke.com>; Angela Angotti <Angela.Angotti@bowmanandbrooke.com>; Estefy Mitre <estefy.mitre@bowmanandbrooke.com>; Sierra Flores <sflores@hannaplaut.com>; Eric Ramos <eric@ericramoslaw.com>; Jorge Herrera <jherrera@herreralaw.com>; Randy Jeffries <rjeffries@ericramoslaw.com>; Sandra Robouin <srobouin@ronramos.com>; Amanda Salvador <amanda@ericramoslaw.com>; Clerk <clerk@ronramos.com>; Ida Montalvo <ida@ronramos.com>; Ronald Ramos <ronramospc@yahoo.com>; Irene Silva <irene@ronramos.com>; Chelsea Ramos <chelsea@ericramoslaw.com>; John Garcia <jgarcia@hannaplaut.com>

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Counsel –

Can each lead attorney respond to this email and indicate whether they would oppose a Motion to Extend the Discovery in the current DCO?

I believe we can keep the current trial date if we extend the discovery period to 30 days prior to the trial date. It's not uncommon for discovery to run up to 30 days prior to trial and all parties definitely need the time.

If you would oppose this motion, please let me know.

Thanks.

Bret Stnaleay



Bret Stanley | Senior Counsel

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